

JP:RTP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

CARLTON COATES-GRIFFITS,
also known as "Martin Luther
Rodgers,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DENNIS J. CARROLL, being duly sworn, deposes and states that he is a
Deportation Officer with United States Immigration and Customs Enforcement ("ICE"), duly
appointed according to law and acting as such.

On or about July 24, 2013, within the Eastern District of New York and elsewhere,
the defendant CARLTON COATES-GRIFFITS, also known as "Martin Luther Rodgers," being
an alien who had previously been arrested and convicted of an aggravated felony, and was
thereafter excluded and removed from the United States, and who had not made a re-application
for admission to the United States to which the Secretary of the Department of Homeland
Security, successor to the Attorney General of the United States, had expressly consented, was
found in the United States.

(Title 8, United States Code, Section 1326(b)(2)).

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COMPLAINT

(T. 8, U.S.C., §§ 1326(a),
1326(b)(2))

The source of your deponent's information and the grounds for his belief are as follows:

1. I am a Deportation Officer with ICE and have been involved in the investigation of numerous cases involving the illegal re-entry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the ICE investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.


2. On or about July 24, 2013, at approximately 2:45 p.m., deportation officers from ICE located and arrested the defendant CARLTON COATES-GRIFFITS in front of 145-11 North Conduit Avenue in Queens, New York.

3. A review of the defendant CARLTON COATES-GRIFFITS' criminal history indicates that on November 5, 2003, the defendant was convicted of Sale/Transportation/Offer to Sell a Controlled Substance, in violation of Section 11352(a) of the California Penal Code. The defendant, a citizen of Jamaica, was sentenced to a prison term of four years. The defendant was removed from the United States on August 23, 2006.

4. The defendant CARLTON COATES-GRIFFITS' fingerprints were taken following his July 24, 2013 arrest. An official from ICE trained in fingerprint analysis compared the fingerprints taken in connection with the defendant's July 24, 2013 arrest with the fingerprints taken in connection with the August 23, 2006 removal from the United States, and determined that the two sets of fingerprints were made by the same individual.

5. A search of ICE records has revealed that there exists no request by the defendant CARLTON COATES-GRIFFITS for permission from either the United States Attorney General or the Secretary of the Department of Homeland Security to re-enter the United States after removal.

WHEREFORE, your deponent respectfully requests that the defendant CARLTON COATES-GRIFFITS be dealt with according to law.



DENNIS J. CARROLL
Deportation Officer
United States Immigration and Customs
Enforcement

Sworn to before me this
25th day of July, 2013



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